

Ronald E. Johnson, Jr. (*pro hac vice*)  
Sarah N. Emery (*pro hac vice*)

**HENDY JOHNSON VAUGHN**

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*Attorneys for Plaintiffs Breathitt*

*County Board of Education*

*[Additional Counsel Listed on Signature Page]*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

Breathitt County School District, By and Through  
the Breathitt County Board of Education v. Meta  
Platforms Inc., et al.

Case No.: 4:23-CV-1804

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF RONALD  
JOHNSON IN SUPPORT OF  
PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANTS'  
MOTIONS FOR SUMMARY  
JUDGMENT (BREATHITT) (SD  
MSJ No. 1)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

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1. I am an attorney duly admitted to practice law in Ohio and Kentucky and admitted *pro hac vice* in this Court. I am a partner at Hendy Johnson Vaughn, and am counsel for the Plaintiff Breathitt County Board of Education. I have personal knowledge of the facts stated in this Declaration, and if called upon to do so, could and would competently testify thereto.

3. Attached as Exhibit 1 is a true and correct copy of the Amended Rebuttal Report of Dr. Sharon A. Hoover, PhD for Breathitt County Board of Education, dated August 7, 2025.

4. Attached as Exhibit 2 is a true and correct copy of the Expert Report of Dr. Sharon A. Hoover, PhD, dated May 16, 2025.

5. Attached as Exhibit 3 is a true and correct copy of the 30(b)(6) Deposition of Phillip Watts, dated April 22, 2025.

6. Attached as Exhibit 4 is a true and correct copy of the 30(b)(1) Deposition of Jeremy Hall, dated July 28, 2025.

7. Attached as Exhibit 5 is a true and correct copy of the Affidavit of Kera Howard, dated May 9, 2025.

8. Attached as Exhibit 6 is a true and correct copy of the 30(b)(1) Deposition of Jeremy Hall, dated April 23, 2025.

9. Attached as Exhibit 7 is a true and correct copy of the 30(b)(6) Deposition of Daphne Noble, dated March 11, 2025.

1           10.     Attached as Exhibit 8 is a true and correct copy of the 2021 KIP Survey District  
2 Report for Breathitt County, produced at BREATHITT00151339.

3           11.     Attached as Exhibit 9 is a true and correct copy of the 30(b)(1) Deposition of Kera  
4 Howard, dated March 10, 2025.

5           12.     Attached as Exhibit 10 is a true and correct copy of the Amended Expert Report of  
6 Dr. Sharon A. Hoover, PhD for Breathitt County Board of Education, dated June 20, 2025.

7           13.     Attached as Exhibit 11 is a true and correct copy of the 30(b)(1) Deposition of  
8 Daphne Noble, dated July 29, 2025.

9           14.     Attached as Exhibit 12 is a true and correct copy of the Breathitt High School Youth  
10 Service Center 2022 Needs Survey for Parents Results, produced at BREATHITT00137977.

11           15.     Attached as Exhibit 13 is a true and correct copy of the 30(b)(6) Deposition of  
12 Hannah Watts, dated March 12, 2025.

13           16.     Attached as Exhibit 14 is a true and correct copy of the 30(b)(6) Deposition of Kera  
14 Howard, dated March 10, 2025.

15           17.     Attached as Exhibit 15 is a true and correct copy of the policies of the Breathitt  
16 County Board of Education, produced at BREATHITT00149001.

17           18.     Attached as Exhibit 16 is a true and correct copy of the Affidavit of Daphne Noble,  
18 dated May 2, 2025.

19           19.     Attached as Exhibit 17 is a true and correct copy of the Affidavit of Jeremy Hall,  
20 dated May 9, 2025.

21           20.     Attached as Exhibit 18 is a true and correct copy of the 30(b)(1) Deposition of  
22 Phillip Watts, dated July 28, 2025.

1           21.     Attached as Exhibit 19 is a true and correct copy of the Affidavit of Will Noble,  
2     dated May 15, 2025.

3           22.     Attached as Exhibit 20 is a true and correct copy of the 30(b)(6) Deposition of Stacy  
4     McKnight, dated April 21, 2025.

5           23.     Attached as Exhibit 21 is a true and correct copy of the Affidavit of Phil Watts,  
6     dated May 5, 2025.

7           24.     Attached as Exhibit 22 is a true and correct copy of the 30(b)(1) Deposition of  
8     Daphne Noble, dated March 11, 2025.

9           25.     Attached as Exhibit 23 is a true and correct copy of the Expert Report of Jeffrey E.  
10     Meyers for Breathitt County School District, dated May 19, 2025.

11           26.     Attached as Exhibit 24 is a true and correct copy of the 30(b)(1) Deposition of  
12     William Noble, dated July 28, 2025.

13           I declare under penalty of perjury under the laws of the United States that the foregoing is  
14     true and accurate.

15     DATED: November 07, 2025

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19                   BY:   /s/Ronald E. Johnson, Jr.  
20                   Ronald E. Johnson, Jr.  
21                   Sarah N. Emery  
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28                   *Attorneys for Plaintiffs Breathitt  
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